

**Minutes for Rule 21 Working Group Meeting #77**  
**Oct. 4, 2006**  
**CEC Headquarters**  
**Sacramento, CA**

There were 25 Working Group members in attendance in person or participating over the internet by Webex.

**Jose Palomo, Chair**

Arthur	Chuck	Arthur Engrg	Mazur	Mike	3 Phases Ergy
Blair	Tom	City of San Diego	Newmiller	Jeff	BEW Eng.
Blazewicz	Stan	Navigant	Prabhu	Edan	Reflective Ergies
Blumer	Werner	CPUC/ED	Salas	Roger	SCE
Collins	Matthew	SCE	Skillman	Fred	PG&E
Couts	George	SCE	Small	Forrest	Navigant
Dossey	Tom	SCE	Solt	Chuck	Lindh & Assoc.
Hughes	Wayde	SMUD	Sugar	John	CEC
Iammarino	Mike	SDG&E	Torribio	Gerome	SCE
Jackson	Jerry	PG&E	Vaziri	Moh	PG&E
Kennedy	Kevin	CEC	Whitaker	Chuck	BEW Engrg
Luke	Robin	RealEnergy			
Manzuk	Chuck	SDG&E			

**Combined Working Group**

**Housekeeping**

- The second quarter DG interconnection status report from SDG&E was posted before the meeting.
- The Group adopted the Minutes from Meeting 76 and 76A with modifications. The minutes will be amended and posted.
- The next meeting of the WG will be February 6, 2007 at SCE in Fontana.

**Rule 21 WG Continuation**

Jose Palomo gave a short PowerPoint presentation on the status of the extension of Rule 21 funding.

There was an open discussion about the future role, scope, mission and format of the Rule 21 Working Group.

- Mike Iammarino again questioned why we need the WG.
- Mike and Fred Skillman questioned how issues would be identified for the WG..
- Jose indicated that he is still seeking input in writing form all interested parties, especially the industry representatives.

- Edan Prabhu reviewed the original purpose of the group: to help simplify and speed up the process for interconnection of DG; he wondered whether the absence of a WG would cause a reversion in the cost and time required for interconnection.
- Iammarino suggested a new group that would handle new issues such as AB 2778 and to keep Rule 21 consistent.
- Chuck Whitaker indicated that the Technical Group still has a full slate of issues including Certification and coordination with other interconnection standards such as FERC and IEEE.
- Kevin Kennedy an advisor to Commissioner Jeff Byron's office indicated that Commissioner Byron is supportive, but feels that the nature of the WG going forward should include the PUC. The Commissioner is pleased with the past progress of the WG.
- The CPUC Energy Division staff was specifically asked its opinion whether previous mandates it had issued to the CEC R21 Working Group were successfully completed. The response from Valerie Beck of the CPUC was affirmative. The DG Community expressed benefits derived from the CEC continuing to host the Working Group forum. Taking into account these opinions and interests, PG&E expressed the need for the R21 WG to now redefine its role and responsibilities going forward. PG&E expressed although the logistical issues (i.e. meeting frequency, use of web-ex technology, etc) being discussed are important to address, it may be advisable for the WG to determine its future mission, scope and role prior to the determination how best to accomplish matters before it.
- Mike Mazur felt that the WG needs goals and responsibilities. We need to resolve issues that always come up. There are many interconnection forums including WDAT, FERC, QFs, the RPS and other. The WG is needed to coordinate, interpret, and maintain the standards.
- There was discussion of WebEx vs. Face-to-face. Although WebEx helps greatly for those unable to attend in person, it was also felt that some interaction is better with face-to-face meetings.
- There was discussion over the fact that the industry participation has dropped off. How can we make it easier for the industry to participate? What issues can we tackle that would make it critical for the industry to participate?
- A reason commonly cited by industry for their reduced participation is that they feel their opinions don't matter.
- Non-utility members expressed dissatisfaction that the WG was not involved in the resolution of Cost Responsibility.
- Regarding Rule 21 Table C.2 "Summary of Producer Cost Responsibility for Multiple Tariff Interconnection", utility members provided an update to the Working Group regarding action taken as a result of CPUC Resolution E-3992 (Issued: July 20, 2006). Mr. Werner Blumer, CPUC Energy Division, indicated Table C.2 as agreed to in principal satisfies all relevant CPUC decisions and Code 2827 et seq.

## **Certification**

There was a short discussion of the status of certification in progress and also of the process itself. Changes are needed in Rule 21 Section J to make it consistent with IEEE1547.1.

### **D.05-08-013**

There was a discussion on whether all issues related to Decision 05-08-013 have been resolved. It was generally agreed that all items from the ordering paragraphs are completed except Para for establishing a website to post the resolution of disputes.. It was agreed that the CEC Rule 21 website [www.rule21.ca.gov](http://www.rule21.ca.gov)) would be the appropriate location for such postings. Posting will begin as soon as the first dispute has been resolved and a resolution summary is provided by the parties.

There is one unresolved item from Decision 05-08-013:

Section II, Summary, states:

*The utilities shall track interconnection costs by tariff (over /under 10 kW and technology of Net Energy Metered (NEM), non-NEM), review level, inspection and distribution system modification cost categories to inform future decisions allocating costs associated with interconnection processing*

Section V, Interconnection Application Review Fees states:

*In the meantime, we herein direct the utilities to track the costs of DG interconnection processing for 1) review in those rate cases and 2) the development of fees that are related to costs.*

However, the Ordering Paragraph did not reconfirm the above directives and the WG has not taken action to address the directives. Edan Prabhu will check with the CPUC what, if any, appropriate action should be.

### **Process Group Breakout**

The WG reviewed the Action Item List and reassigned all remaining items.

Item C147 calls for a review of all of the CPUC reporting requirements related to DG with a view to reducing and consolidating the information. Werner Blumer suggested that one approach would be to develop a master data file that could be used by the CPUC and others to get any type of report it requires. Werner will forward the list that was developed to all WG members. The utilities will review the list and assess whether they would benefit from consolidated reporting this item.

### **Technical Group Breakout**

The Tech group also reviewed the Action Item List. With several new faces in the room, some time was spent explaining the various issues.

PG&E voiced a concern about the applicability of the rule to Transmission level interconnections (e.g., customers provided primary service who want to add a relatively small cogen or PV system, not interested in reselling the excess power). It was noted that the applicability section of the document limits Rule 21 to distribution level interconnections so using it for transmission would be at the convenience of both parties. It was suggested to add some wording to the applicability section contemplating it's possible use in the transmission world:

This rule may have applicability to transmission level interconnections. Applications choosing to use the technical evaluations contained in this rule for transmission level (i.e., outside of the CPUC jurisdiction) interconnection are not eligible for simplified interconnection and must start at the supplemental review level.

May also add some language to the Initial Review Process to force transmission interconnections, like Network interconnections, immediately to supplemental review.

The Tech breakout ended somewhat prematurely due to a conflict with the conference room scheduling.

Submitted by: Chuck Solt

Approved by: Edan Prabhu